IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: MARIAN A. MURPHY : CASE NO.: 1:18-bk-03400-HWV

:

**Debtor** :

**DEBTOR'S MOTION TO TERMINATE WAGE ATTACHMENT** 

AND NOW COMES, Debtor, Marian A. Murphy, by and through her attorneys,

Jacobson, Julius & Harshberger, who hereby files this Motion to Terminate Wage Attachment

and in support thereof states:

1. Debtor filed a Chapter 13 Petition on or about August 15, 2018.

2. This Honorable Court approved a wage attachment of Debtor's wages on April 22,

2019 and further directed Department of Veterans Affairs to withhold funds from Debtor's wages

to pay the Chapter 13 Trustee.

3. Debtor files this motion seeking an Order terminating said wage attachment

because the case is now complete, and no further payments are due to the Chapter 13 Trustee.

WHEREFORE, Debtor respectfully requests that this Court enter an Order directing the

above-mentioned employer to terminate the payments to the Chapter 13 Trustee.

Respectfully Submitted,

JACOBSON, JULIUS & HARSHBERGER

Dated: September 27, 2023 /s/ Chad J. Julius

ID# 209496

8150 Derry Street

Harrisburg, PA 17111.5260

717.909.5858

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IN RE: MARIAN A. MURPHY : CASE NO.: 1:18-bk-03400-HWV

:

Debtor

## **PROOF OF SERVICE**

**AND NOW**, this 27th day of September, 2023 I, Dera Shade, with Jacobson, Julius & Harshberger, attorneys for the Debtor, hereby certify that on this day I served the within *Motion to Terminate Wage Attachment* upon the following persons by forwarding the same via CM/ECF and/or first-class mail—

Jack N. Zaharopoulos, Esq. 8125 Adams Drive Suite A Hummelstown, PA 17036

United States Trustee
The Sylvia H. Rambo US Courthouse
1501 North 6th Street, Bankruptcy Courtroom 8, 4th Floor
Harrisburg, PA 17102

Payroll Department County of Dauphin PO Box 1295 Harrisburg, PA 17108

By: /s/Dera Shade

Dera Shade, Paralegal

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: MARIAN A. MURPHY : CASE NO.: 1:18-bk-03400-HWV

:

Debtor :

**UPON CONSIDERATION** of the above-referenced Debtor, Marian A. Murphy, having filed a *Motion to Terminate Wage Attachment* under Chapter 13 of the Bankruptcy Code;

**IT IS HEREBY ORDERED** that the Motion is GRANTED and that the entity from whom Debtor receives income:

Payroll Department County of Dauphin PO Box 1295 Harrisburg, PA 17108

shall terminate all deductions and wage attachments remitted to Chapter 13 Trustee, Jack N. Zaharopoulos, from said Debtor's income, previously ordered by this Honorable Court on April 22, 2019.